

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In Re: AUTOMOTIVE PARTS  
ANTITRUST LITIGATION

Case No. 12-md-02311  
Honorable Marianne O. Battani

---

In re: CERAMIC SUBSTRATES

---

This Document Relates to:

All Auto Dealer Actions  
All End-Payor Actions

---

2:16-cv-3802-MOB-MKM  
2:16-cv-3803-MOB-MKM

THIS RELATES TO:

LANDERS AUTO GROUP NO. 1, INC.,  
D/B/A, LANDERS TOYOTA, et al.,

Plaintiffs,

vs.

DENSO CORPORATION, et al.,

Defendants;

and

IFEOMA ADAMS, et al.,

Plaintiffs,

vs.

DENSO CORPORATION, et al.,

Defendants.

---

2:16-cv-12194-SJM-MKM

2:16-cv-11804-MOB-MKM

STIPULATION AND ORDER REGARDING  
CLASS ACTION COMPLAINTS AND MOTIONS TO DISMISS

WHEREAS, End-Payor Plaintiffs (“EPPs”) and Auto Dealer Plaintiffs (“ADPs”) have filed the above-captioned actions (“Actions”) against the Defendants, including DENSO Corporation and DENSO International America, Inc. (“Stipulating Defendants”), alleging violations of Section 1 of the Sherman Act as well as various State antitrust, consumer protection, and unjust enrichment laws in connection with the sale of automobile Ceramic Substrates. So as to preserve both party and judicial resources, ADPs, EPPs, and Defendants DENSO Corporation and DENSO International America, Inc., (collectively, “Stipulating Parties”), by and through their undersigned counsel, stipulate to the following with respect to the Actions:

1. Counsel for Stipulating Defendants agrees to accept service of the EPP complaint, filed on May 20, 2016, and the ADP complaint, filed on June 14, 2016, on behalf of the Stipulating Defendants, in satisfaction of the requirements of Fed. R. Civ. P. 4.

2. Stipulating Parties are working to resolve several outstanding issues. As such, Stipulating Defendants’ obligation to answer, move, or otherwise respond to the operative complaint(s) shall be stayed pending resolution of these issues. Once resolved, Stipulating Parties shall meet and confer to agree upon a reasonable schedule for the filing of answers, motions, or other responses to the operative complaint(s).

3. Stipulating Parties further stipulate and agree that the entry into this stipulation by Stipulating Defendants shall not constitute a waiver of (a) any jurisdictional defenses that may be available under Rule 12 of the Federal Rules of Civil Procedure, (b) any affirmative defenses under Rule 8 of the Federal Rules of Civil Procedure or (c) any other statutory or common law defenses that may be available to Stipulating Defendants in this or any other related actions

concerning ceramic substrates, except sufficiency of process and sufficiency of service of process. Stipulating Defendants expressly reserve the right to raise any such defenses (or any other defense) in response to (a) the current Complaint or any other amended and/or consolidated complaint that may be filed on behalf of any of the ADPs or EPPs, and/or (b) any complaint that may be filed in any related action concerning ceramic substrates.

**IT IS SO ORDERED.**

Date: August 10, 2016

s/Marianne O. Battani  
MARIANNE O. BATTANI  
United States District Judge

**STIPULATED TO AND APPROVED BY:**

Dated: July 8, 2016

/s/ Steven F. Cherry

Steven F. Cherry

David P. Donovan

Brian C. Smith

**WILMER CUTLER PICKERING HALE AND  
DORR LLP**

1875 Pennsylvania Avenue NW

Washington, DC 20006

Telephone: (202) 663-6000

Facsimile: (202) 663-6363

steven.cherry@wilmerhale.com

david.donovan@wilmerhale.com

brian.smith@wilmerhale.com

***Counsel for DENSO Corporation and  
DENSO International America, Inc.***

Steven M. Zarowny (P33362)

General Counsel

DENSO International America, Inc.

24777 Denso Drive

Southfield, MI 48033

Tel.: (248) 372-8252

Fax: (248) 213-2551

steve\_zarowny@denso-diam.com

***Counsel for Defendant DENSO International  
America, Inc.***

Dated: July 8, 2016

/s/ Hollis Salzman

Hollis Salzman

Bernard Persky

William V. Reiss

**ROBINS KAPLAN LLP**

601 Lexington Avenue, Suite 3400

New York, NY 10022

Telephone: (212) 980-7400

Facsimile: (212) 980-7499

HSalzman@RobinsKaplan.com

BPersky@RobinsKaplan.com

WReiss@RobinsKaplan.com

Steven N. Williams

Demetrius X. Lambrinos  
Elizabeth Tran  
**COTCHETT, PITRE &  
McCARTHY, LLP**  
San Francisco Airport Office Center  
840 Malcolm Road, Suite 200  
Burlingame, CA 94010  
Telephone: (650) 697-6000  
Facsimile: (650) 697-0577  
fdamrell@cpmlegal.com  
swilliams@cpmlegal.com  
dlambrinos@cpmlegal.com  
etran@cpmlegal.com

Marc M. Seltzer  
Steven G. Sklaver  
**SUSMAN GODFREY LLP**  
1901 Avenue of the Stars, Suite 950  
Los Angeles, CA 90067-6029  
Telephone: (310) 789-3100  
Facsimile: (310) 789-3150  
mseltzer@susmangodfrey.com  
ssklaver@susmangodfrey.com

Terrell W. Oxford  
Omar Ochoa  
**SUSMAN GODFREY LLP**  
901 Main Street, Suite 5100  
Dallas, Texas 75202  
Telephone: (214) 754-1900  
Facsimile: (214) 754-1933  
toxford@susmangodfrey.com  
oochoa@susmangodfrey.com

*Attorneys for Plaintiff and Interim Co-Lead  
Class Counsel for End-Payor Plaintiffs.*

Dated: July 8, 2016

/s/ Gerard V. Mantese

Gerard V. Mantese  
(Michigan Bar No. P34424)  
Alexander E. Blum  
(Michigan Bar No. 74070)  
**MANTESE HONIGMAN, P.C.**  
1361 E. Big Beaver Road  
Troy, Michigan 48083  
Telephone: (248) 457-9200  
gmantese@manteselaw.com  
ablum@manteselaw.com

***Interim Liaison Counsel for Dealership  
Plaintiffs***

Jonathan W. Cuneo  
Joel Davidow  
Daniel Cohen  
Victoria Romanenko  
Evelyn Li  
**CUNEO GILBERT & LaDUCA, LLP**  
507 C Street, N.E.  
Washington, DC 20002  
Telephone: (202) 789-3960  
johnc@cuneolaw.com  
joel@cuneolaw.com  
danielc@cuneolaw.com  
vicky@cuneolaw.com  
evelyn@cuneolaw.com

Don Barrett  
David McMullan  
Brian Herrington  
**BARRETT LAW GROUP, P.A.**  
P.O. Box 927  
404 Court Square  
Lexington, MS 39095  
Telephone: (662) 834-2488  
Facsimile: (662) 834-2628  
dbarrett@barrettlawgroup.com  
bherrington@barrettlawgroup.com  
dmcmullan@barrettlawgroup.com

Shawn M. Raiter  
**LARSON KING, LLP**  
2800 Wells Fargo Place  
30 East Seventh Street  
St. Paul, MN 55101  
Telephone: (651) 312-6500  
Facsimile: (651) 312-6618  
sraiter@larsonking.com

***Interim Co-Lead Class Counsel for Dealership Plaintiffs***

Brian Herrington  
**HERRINGTON LAW, PA**  
PO Box 3260  
Ridgeland, MS 39158  
Telephone: (601) 376-9331  
brian@herringtonlawpa.com

***Counsel for Dealership Plaintiffs***